

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Petitions for Reconsideration Regarding)

The Video Relay Service (VRS) Interim) CC Docket No. 98-67

Per-Minute Compensation Rate)

Comments

Submitted by

Clay Nettles, Executive Director
Registry of Interpreters for the Deaf
333 Commerce St
Alexandria, VA 22314
703-838-0030
admin@rid.org

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Background:

My name is Clay Nettles. I am the executive director of the national professional association of interpreters for the deaf, the Registry of Interpreters for the Deaf (RID). RID was created in 1972. With well over 10,000 members in our national, regional and local structure, the RID strives to support our members in their work, promote continuing education for working interpreters and assure the highest quality services for our consumers. The RID philosophy sets forth that excellence in the delivery of interpretation and transliteration services among people who are Deaf, or Hard of Hearing, and people who are hearing, will ensure effective communication. As the professional association for interpreters, the RID serves as an essential arena for its members in their pursuit of professional excellence.

I want to take this opportunity to express our gratitude to the FCC for their work on establishing a national system that allows interpreting services to open telecommunications to Deaf and hard of hearing Americans. We thank you, too, for reconsidering the Video Relay Service (VRS) Interim Compensation Rate.

RID interpreters have been involved in making the dream of video relay a reality. They have worked diligently from the initial concepts through testing to establishing networks of interpreters trained and ready to provide needed services in this new venue. Today, our members are the backbone of the industry's successes and their position as the labor force for this new service is the reason for my letter today.

The reduction in the compensation rate has affected the entire industry, but none more dramatically than the interpreters who provide the actual service. The response to the rate reductions have meant that the companies hiring the interpreters have either cut services or let interpreters go, meaning that those still working are expected to do the same volume of work with less people. That has put a severe strain on the interpreters.

Occupational Safety for the Video Relay Interpreters:

Overuse/Cumulative Motion Injury is a well known problem for sign language interpreters. Our field has worked to increase the number of qualified interpreters as the demand for interpreting services has grown through the past decade. We have struggled to assure services while protecting our precious human resources. The RID has taken the lead on improving working conditions for interpreters to assure that both the demand for services can be met and our interpreters are protected. The RID has published two Standard Practices Papers relating to this problem, "Cumulative Motion Injury," and "Team Interpreting." [These papers can be found on our web site: www.rid.org.]

The high occupancy rate required of the service providers is putting our members at risk. The work setting, prior to the rate reduction, was reasonable and safe.

The field of Video Interpreters has been appealing to our members because of the new technology and the ability to serve a variety of clients without having to deal with the stress of commuting. The current increase in expectations of service with a demand for increased occupancy rates has made the job much less attractive and, in fact, dangerous. Many interpreters now feel that they are being asked to accept call after call with no breaks. This is contrary to all of the industry standards that have been set for interpreters and may threaten to deter qualified interpreters from working in this setting.

The itinerant nature of “community” interpreting aside, the jobs are deemed to be safer due to the industry standards that have been accepted throughout the field to assure the occupational safety of our interpreters. Currently, interpreters can expect to have reasonable breaks from interpreting, which can be very demanding physically and mentally. They can expect to work with a team interpreter for any job lasting 2 hours or more. The message to interpreters could be that community interpreting is safe and video relay interpreting is not.

The vendors of Video Relay Services, faced with the lower rate, are increasing the expectations by requiring higher occupancy rates, creating a work climate where more long-term injuries may occur. Based on our experience it is strongly recommended that this occupancy rate should not exceed 40%. Further, to protect interpreters, we ask that this occupancy rate be looked at on an hourly basis instead of daily, weekly or monthly. There must also be mandated rest breaks for these workers. Our interpreters are at stake.

Consumer Satisfaction and National Certification Requirements for Interpreters:

RID certification has been the standard for 30 years. We are currently working with the National Association of the Deaf (NAD) to develop a new joint certification. The RID offers the following programs that support certification: Certification Maintenance Program, requiring continuing education; and our Ethical Practices System, which offers mediation and a formal grievance structure.

Wisely, VRS has required national certification as a condition of employment in this new field. Because VRS requires its interpreters to be able to serve all callers, it is necessary to assure that the industry require skilled labor with a minimum of national certification.

If the VRS rates remain at current levels or are lowered, there is a concern that vendors might turn to lower-skilled, lower-paid interpreters which would cause an ineffective VRS program. The current pool of highly skilled interpreters has been able to process calls quite efficiently increasing the cost effectiveness by containing the length of calls. Lesser-skilled interpreters may have to ask for clarification more often extending the length of each call. Equally important - the use of lesser skilled non-certified interpreters could cause a higher risk of misinterpretations which may lead to dissatisfaction on the part of callers. It could even work counter to the goals of equal communication by causing misunderstandings with the people the deaf consumers are calling.

In closing, it is strongly recommended that the FCC recognize the impact on the labor pool and the consumers they serve. It is clear to us that our interpreters will face a dangerous expectation of higher occupancy rates that will adversely affect their working conditions. The deaf consumers will be impacted by a threatened loss of interpreter credentialing standards. On behalf of professional sign language interpreters, we ask that you consider their plight when determining the VRS compensation rate.

Respectfully submitted by

Clay Nettles
Executive Director
Registry of Interpreters for the Deaf